Michael J. Frevola

James H. Power

Marie E. Larsen

Warren E. Gluck

HOLLAND & KNIGHT LLP

31 West 52nd St.

New York, NY 10019

Telephone: (212) 513-3200

Telefax: (212) 385-9010

michael.frevola@hklaw.com

james.power@hklaw.com

marie.larsen@hklaw.com

warren.gluck@hklaw.com

ATTORNEYS FOR RESPONDENT

JSC NORVIK BANKA

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

GOLDEN HORN SHIPPING CO. LTD.,

Plaintiff,

Case No. 14-cv-2168 (JPO)

v.

VOLANS SHIPPING COMPANY LIMITED and

NORVIK BANKA,

Defendants.

NOTICE OF MOTION TO VACATE ATTACHMENT

PLEASE TAKE NOTICE THAT Defendant JSC NORVIK BANKA, sued herein as NORVIK BANKA, pursuant to Rule E(4)(f) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure, will move this Court at a time and date to be set by this Court for an order (1) vacating the

Attachment Order dated March 28, 2014 and/or (2) vacating the attachment of funds held in a correspondent bank account at Deutsche Bank Trust Company Americas.

Dated: July 15, 2014

New York, New York

HOLLAND & KNIGHT LLP Attorneys for Respondents

By: /s/ Michael J. Frevola

Michael J. Frevola James H. Power Marie E. Larsen

Warren E. Gluck 31 West 52nd Street

New York, New York 10019

Tel: (212) 513-3200 / Fax: (212) 385-9010

michael.frevola@hklaw.com james.power@hklaw.com marie.larsen@hklaw.com warren.gluck@hklaw.com Attorneys for Defendant JSC Norvik Banka